

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**DEFENDANT'S MOTION TO FILE UNREDACTED MEMORANDUM IN SUPPORT  
OF MOTION TO SUPPRESS EVIDENCE SEIZED AS A RESULT OF THE  
EXECUTION OF A SEARCH WARRANT UNDER SEAL**

Now comes the defendant Benjamin Shacar and requests that the Court allow the defendant to file his Unredacted Memorandum in Support of Motion to Suppress Evidence Seized as a Result of the Execution of a Search Warrant dated January 29, 2025, under seal.

In support of this motion, the defendant states that some of the content contained in the memorandum contains information which would be protected under ¶3 of the protective order approved by Magistrate Judge Robertson in this case on July 14, 2021. [Dkt. 25].

Respectfully submitted,

BENJAMIN SHACAR

/s/ William J. O'Neil  
WILLIAM J. O'NEIL  
Attorney for the Defendant  
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**CERTIFICATE OF SERVICE**

I hereby certify that true copies of this document will be served on the registered parties through the ECF system on this date January 29, 2025.

/s/ William J. O'Neil  
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